

*West Virginia Department of Environmental Protection
Division of Air Quality*

*Joe Manchin, III
Governor*

*Stephanie R. Timmermeyer
Cabinet Secretary*

Permit to Operate



*Pursuant to
Title V
of the Clean Air Act*

Issued to:
Equitrans, L.P.
West Union Compressor Station #53
R30-01700001-2007

*John A. Benedict
Director*

*Issued: December 28, 2007 • Effective: January 11, 2008
Expiration: December 28, 2012 • Renewal Application Due: June 28, 2012*

Permit Number: **R30-01700001-2007**
Permittee: **Equitrans, L.P.**
Facility Name: **West Union Compressor Station #53**
Permittee Mailing Address: **225 North Shore Drive Pittsburgh, PA 15212**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location: West Union, Doddridge County, West Virginia
Facility Mailing Address: HC69 Box 36 West Union, WV 26456
Telephone Number: (304) 873-1060
Type of Business Entity: Corporation
Facility Description: Natural Gas Compressor Station
SIC Codes: 4922
UTM Coordinates: 516.0 km Easting • 4,353.0 km Northing • Zone 17

Permit Writer: Bobbie Scroggie

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

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1.0 Emission Units and Active R13, R14, and R19 Permits

1.1 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Design Capacity	Year Installed
C-001	C-001	Reciprocating Engine/Integral Compressor; Ingersoll-Rand 8SVS, 125E	1080 HP	1974
C-002	C-002	Reciprocating Engine/Integral Compressor; Ingersoll-Rand 8SVS, 124E	1080 HP	1974
C-003	C-003	Reciprocating Engine/Integral Compressor; Ingersoll-Rand 8SVS, 123E	1080 HP	1974
G-001	G-001	Reciprocating Engine/Generator; Waukesha H2475	250 HP	1974
G-002	G-002	Reciprocating Engine/Generator; Waukesha H2475	250 HP	1974
		Heating Boiler	1.25 MMBTU/hr	1974
Dehy	Flare	Dehydration Boiler	750,000 BTU/hr	1974
Flare	Flare	Dehydration Flare	98% destruction efficiency	
Dehy #2 (1S)	1E	TEG Dehydration Unit	0.625 MM scf/hr, 15 MM scf/day, 5,475 MM scf/yr natural gas	2003
Dehy #2 (2S)	2E	TEG Dehydrator Reboiler	0.75MM Btu/hr	2003
Thermal Oxidizer (1C)	1E	TEG Dehydration Unit Thermal Oxidizer	98% destruction efficiency, 7 MM Btu/hr	2003

1.2 Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2565A	January 23, 2007

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months

2.2. Acronyms

CAAA	Clean Air Act Amendments	NESHAPS	National Emissions Standards for Hazardous Air Pollutants
CBI	Confidential Business Information	NO_x	Nitrogen Oxides
CEM	Continuous Emission Monitor	NSPS	New Source Performance Standards
CES	Certified Emission Statement	PM	Particulate Matter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	pph	Pounds per Hour
C.S.R. or CSR	Codes of State Rules	ppm	Parts per Million
DAQ	Division of Air Quality	PSD	Prevention of Significant Deterioration
DEP	Department of Environmental Protection	psi	Pounds per Square Inch
FOIA	Freedom of Information Act	SIC	Standard Industrial Classification
HAP	Hazardous Air Pollutant	SIP	State Implementation Plan
HON	Hazardous Organic NESHAP	SO₂	Sulfur Dioxide
HP	Horsepower	TAP	Toxic Air Pollutant
lbs/hr	Pounds per Hour	TPY	Tons per Year
LDAR	Leak Detection and Repair	TRS	Total Reduced Sulfur
m	Thousand	TSP	Total Suspended Particulate
MACT	Maximum Achievable Control Technology	USEPA	United States Environmental Protection Agency
mm	Million	UTM	Universal Transverse Mercator
mmBtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
mmft³/hr	Million Cubic Feet Burned per Hour	VOC	Volatile Organic Compounds
NA or N/A	Not Applicable		
NAAQS	National Ambient Air Quality Standards		

2.3. Permit Expiration and Renewal

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
 - a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
 - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.
[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
 - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
 - c. The change shall not qualify for the permit shield.
 - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
 - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9]

2.11. Operational Flexibility

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

[45CSR§30-5.8]

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

[45CSR§30-5.8.a.]

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
 - b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
 - c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.
- [45CSR§30-5.1.i.]**

2.13. Duty to Comply

- 2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- [45CSR§30-5.1.f.1.]**

2.14. Inspection and Entry

- 2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:
 - a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
 - d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.
- [45CSR§30-5.3.b.]**

2.15. Schedule of Compliance

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

- b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.
[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.
[45CSR§30-5.1.f.2.]

2.17. Emergency

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
[45CSR§30-5.7.a.]
- 2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.
[45CSR§30-5.7.b.]
- 2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
[45CSR§30-5.7.c.]
- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
[45CSR§30-5.7.d.]

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.
[45CSR§30-5.2.a.]
- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.
[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.
[45CSR§30-4.2.]

2.21. Permit Shield

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]
- 2.21.2. Nothing in this permit shall alter or affect the following:
- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
 - b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.

- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.
[45CSR§30-5.6.c.]

2.22. Credible Evidence

- 2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.
[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

- 2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.
[45CSR§30-5.1.e.]

2.24. Property Rights

- 2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.
[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

- 2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.
 - a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
 - b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
 - c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.
[45CSR§30-5.1.d.]
- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.
[45CSR§30-5.1.a.2.]

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40 C.F.R. 61 and 45CSR15]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.
- [40 C.F.R. 82, Subpart F]

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]

3.2. Monitoring Requirements

- 3.2.1. None.

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
 - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- [WV Code § 22-5-4(a)(15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.]

- 3.4.2. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

[45CSR§30-5.1.c.2.B. and 45CSR13 - Permit No. R13-2565 - Condition 3.4.1.]

- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§30-5.1.c. State-Enforceable only.]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

[45CSR§30-4.4. and 5.1.c.3.D.]

- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

[45CSR§30-5.1.c.3.E.]

- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class, or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.
[45CSR§30-5.3.e.]
- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.
[45CSR§30-5.1.c.3.A.]
- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.
- 3.5.8. **Deviations.**
- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
 1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
 2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

3.6.1. None.

3.7. Permit Shield

3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

- | | | |
|----|--------------------------------|--|
| a. | 40 C.F.R. 60
Subparts K, Ka | <i>Standards of Performance for Storage Vessels for Petroleum Liquids.</i> All tanks at West Union station are below 40,000 gallons in capacity. |
| b. | 40 C.F.R. 60
Subpart Kb | <i>Standards of Performance for Volatile Organic Liquid Storage Vessels.</i> Tanks 1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, and 15 are below 75m ³ gallons in capacity. |
| c. | 40 C.F.R. 60
Subpart KKK | <i>Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants.</i> West Union station is not engaged in the extraction of natural gas liquids from field gas or in the fractionation of mixed natural gas liquids to natural gas products. |

4.0. Source-Specific Requirements [Indirect Heat Exchangers: Heating Boiler, 2S]

4.1. Limitations and Standards

- 4.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.
[45CSR§2-3.1.]

4.2. Monitoring Requirements

- 4.2.1. None

4.3. Testing Requirements

- 4.3.1. None

4.4. Recordkeeping Requirements

- 4.4.1. None

4.5. Reporting Requirements

- 4.5.1. None

4.6. Compliance Plan

- 4.6.1. None

5.0. Source-Specific Requirements [Flare and Dehy]

5.1. Limitations and Standards

- 5.1.1. No person shall cause, suffer, allow or permit particulate matter to be discharged from any incinerator into the open air in excess of the quantity determined by the use of the following formula:

Emissions(lb/hr) = F x Incinerator Capacity (tons/hr)
where the factor, F, is as indicated in the table below:

<u>Incinerator Capacity</u>	<u>F Factor</u>
Less than 15,000 lbs/hr	5.43
15,000 lbs/hr or greater	2.72

*Calculation for PM Emissions: 5.43 * 257 lb/hr * 1 ton/2000 lbs = 0.6972 lb/hr*
[45CSR§6-4.1. (Flare)]

- 5.1.2. No person shall cause, suffer, allow or permit emission of smoke into the atmosphere from any incinerator which is twenty (20%) percent opacity or greater.
[45CSR§6-4.3. (Flare)]
- 5.1.3. The provisions of Section 5.1.2. of this permit shall not apply to smoke which is less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per start-up.
[45CSR§6-4.4. (Flare)]
- 5.1.4. No person shall cause, suffer, allow or permit the emission of particles of unburned or partially burned refuse or ash from any incinerator which are large enough to be individually distinguished in the open air.
[45CSR§6-4.5. (Flare)]
- 5.1.5. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.
[45CSR§6-4.6. (Flare)]
- 5.1.6. No person shall cause, suffer, allow or permit the combustion of any refinery process gas stream or any other process gas stream that contains hydrogen sulfide in a concentration greater than 50 grains per 100 cubic feet of gas except in the case of a person operating in compliance with an emission control and mitigation plan approved by the Director and U. S. EPA.
[45CSR§10-5.1. (Flare)]
- 5.1.7. The maximum emission rate of Benzene from the dehy flare shall not exceed 0.99 tons per year.
[45CSR§30-12.7. (Flare)]
- 5.1.8. The Dehy Flare shall be operated at all times when emissions may be vented to it and with a flame present at all times.
[45CSR§30-12.7. and 40 C.F.R. § 64.3(a)(1) (Flare)]

5.2. Monitoring Requirements

- 5.2.1. The permittee shall conduct visible emission checks and/or opacity monitoring for any flare, thermal oxidizer, or glycol dehydration unit reboiler vent.

The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at any flare or glycol dehydration unit reboiler vent for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present at any flare, thermal oxidizer, or glycol dehydration unit reboiler vent for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) using the procedures and requirements of Method 9 as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A Method 9 observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

[45CSR§30-5.1.c.]

- 5.2.2. **Determination of benzene emissions.** The procedures of this paragraph shall be used by an owner or operator to determine benzene emissions to meet the criteria for the exemption from control requirements under 40 C.F.R. §63.1274(d).

The determination of actual average benzene emissions from a glycol dehydration unit shall be made using the procedures of either paragraph a. or b. below. Emissions shall be determined either uncontrolled or with federally enforceable controls in place.

- a. The owner or operator shall determine actual average benzene emissions using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled “Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions” (GRI-95/0368.1); or
- b. The owner or operator shall determine an average mass rate of benzene emissions in pounds per hour through direct measurement by performing three runs of Method 18 in 40 CFR part 60, appendix A (or an equivalent method), and averaging the results of the three runs. Annual emissions in tons per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year.

[40 C.F.R. § 63.1282(a)(2)(i) and (ii) and 45CSR34]

- 5.2.3. The Dehydration unit shall be equipped with a pilot flame detecting device (e.g. infrared, thermocouple, etc.) to continuously monitor the presence of a pilot flame and shall sound an alarm if no flame is detected.

[45CSR§30-12.7. and 40 C.F.R. § 64.3(b)(1)]

- 5.2.4. For the device that detects the presence of a flame, calibration, maintenance, and operation shall be conducted in accordance with manufacturer's specifications. The flare shall maintained in accordance with 40 C.F.R. 60.18.

[45CSR§30-12.7. and 40 C.F.R. § 64.3(b)(3)]

5.3. Testing Requirements

5.3.1. None.

5.4. Recordkeeping Requirements

5.4.1. An owner or operator that is exempt from control requirements under 40 CFR § 63.1274(d) shall maintain records of the actual average benzene emissions (in terms of benzene emissions per year), as determined in accordance with Section 5.2.2. of this permit, for each glycol dehydration unit.

[40 CFR § 63.1284(d) and 45CSR34]

5.4.2. The following data shall be gathered and maintained on site:

- a. Any corrective action taken in response to an indicator showing noncompliance.
- b. Flare inspections.
- c. The presence or absence of visible emissions.
- d. Method 9 Visual Emissions Evaluation of opacity (if emissions are detected during inspections)
- e. Any time the flare is not operating.
- f. Any internal inspections performed.
- g. Any maintenance or repairs performed as a result of these inspections including date, time, and name of person performing repairs.

[45CSR§30-12.7. and 40 C.F.R § 64.9(b)]

5.5. Reporting Requirements

5.5.1. None.

5.6. Compliance Plan

5.6.1. None.

6.0. Source-Specific Requirements [Dehy #2 (1S & 2S) and Thermal Oxidizer (1C)]

6.1. Limitations and Standards

- 6.1.1. No person shall cause, suffer, allow or permit emission of smoke into the atmosphere from any incinerator which is twenty (20%) percent opacity or greater.
[45CSR§6-4.3. and 45CSR13 - Permit No. R13-2565, Condition 4.1.14. (1C)]
- 6.1.2. The provisions of Section 6.1.1 of this permit shall not apply to smoke which is less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per start-up.
[45CSR§6-4.4. and 45CSR13 - Permit No. R13-2565, Condition 4.1.15. (1C)]
- 6.1.3. No person shall cause, suffer, allow or permit the emission of particles of unburned or partially burned refuse or ash from any incinerator which are large enough to be individually distinguished in the open air.
[45CSR§6-4.5. (1C)]
- 6.1.4. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.
[45CSR§6-4.6. (1C)]
- 6.1.5. No person shall cause, suffer, allow or permit the combustion of any refinery process gas stream or any other process gas stream that contains hydrogen sulfide in a concentration greater than 50 grains per 100 cubic feet of gas except in the case of a person operating in compliance with an emission control and mitigation plan approved by the Director and U. S. EPA.
[45CSR§10-5.1. (1C)]
- 6.1.6. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2565, R13-2565A, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to.
[45CSR13 - Permit No. R13-2565, Condition 2.5.1.]
- 6.1.7. The maximum amount of wet gas processed through the contact tower of the TEG Dehydration Unit (Dehy #2, 1S) shall not exceed 0.625 MMscf/hr or 15 MMscf/day (5,475 MMscf/year). Compliance with the processing limit shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of the wet gas processed at any given time for the previous twelve (12) consecutive calendar months.
[45CSR13 - Permit No. R13-2565, Condition 4.1.1.]
- 6.1.8. The maximum emission rates from the TEG dehydration unit reboiler (emission point 2E), shall not exceed the following:

Pollutant	Hourly (lb/hr)	Annual (ton/yr)
Carbon Monoxide	0.07	0.28
Nitrogen Oxides	0.08	0.33
Particulate Matter	0.01	0.03
Sulfur Dioxide	0.01	0.01
Volatile Organic Compounds	0.01	0.02

Compliance with the limit for particulate matter assures compliance with the regulatory limit of 45CSR6.
[45CSR13 - Permit No. R13-2565, Condition 4.1.2.]

6.1.9. The TEG dehydration unit reboiler (2S) shall not consume more than 0.75 MMBtu/hr of natural gas.
[45CSR13 - Permit No. R13-2565, Condition 4.1.3.]

6.1.10. The TEG dehydrator shall be equipped with a thermal oxidizer (1C), identified as emission point 1E in the process flow diagram of permit application R13-2565A, to control organic compound emissions. The thermal oxidizer shall be fired with natural gas and shall be operated with a destruction efficiency of 98% or greater, and in accordance with 40 CFR 60.18 "General Control Device Requirements" paragraphs (c) through (f).
[45CSR13 - Permit No. R13-2565, Condition 4.1.6.]

6.1.11. The maximum emission rate from the thermal oxidizer, identified as emission point 1E in the process flow diagram of permit application R13-2565, shall not exceed the following:

Pollutant	Hourly (lb/hr)	Annual (ton/yr)
Volatile Organic Compounds	1.01	4.41
Total HAPs	0.09	0.39

*Emissions from natural gas combustion and waste gas combustion.
[45CSR13 - Permit No. R13-2565, Condition 4.1.7.]

6.1.12. The TEG dehydration unit thermal oxidizer shall not consume more than 7 MMBtu/hr of natural gas.
[45CSR13 - Permit No. R13-2565, Condition 4.1.8.]

6.1.13. Potential HAP emissions from the glycol dehydration unit shall be limited to less than 10 TPY of any single HAP and 25 TPY of any combination of HAPs. Compliance with these limits assures compliance with Permit No. R13-2565, Condition 4.1.9.
[45CSR§30-12.7.]

6.1.14. The maximum emission rate of Benzene from the thermal oxidizer, identified as emission point 1E in the process flow diagram of permit application R13-2565, shall not exceed 0.99 tons per year.
[45CSR§30-12.7.]

6.1.15. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11. and 45CSR13 - Permit No. R13-2565, Condition 4.1.18.]

6.2. Monitoring Requirements

6.2.1. The permittee shall conduct visible emission checks and/or opacity monitoring for any flare, thermal oxidizer, or glycol dehydration unit reboiler vent.

The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting,

observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at any flare or glycol dehydration unit reboiler vent for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present at any flare, thermal oxidizer, or glycol dehydration unit reboiler vent for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) using the procedures and requirements of Method 9 as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A Method 9 observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

[45CSR13 - Permit R13-2565, Condition 4.2.1.]

- 6.2.2. **Determination of benzene emissions.** The procedures of this paragraph shall be used by an owner or operator to determine benzene emissions to meet the criteria for the exemption from control requirements under 40 C.F.R. § 63.1274(d).

The determination of actual average benzene emissions from a glycol dehydration unit shall be made using the procedures of either paragraph a. or b. below. Emissions shall be determined either uncontrolled or with federally enforceable controls in place.

- a. The owner or operator shall determine actual average benzene emissions using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled “Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions” (GRI-95/0368.1); or
- b. The owner or operator shall determine an average mass rate of benzene emissions in kilograms per hour through direct measurement by performing three runs of Method 18 in 40 CFR part 60, appendix A (or an equivalent method), and averaging the results of the three runs. Annual emissions in kilograms per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to megagrams per year.

[40 C.F.R. § 63.1282(a)(2)(i) and (ii) and 45CSR34]

- 6.2.3. To demonstrate compliance with Sections 6.1.11. and 6.1.14. of this permit, the permittee shall monitor the thermal oxidizer combustion chamber temperature manually on an hourly basis or continuously using electronic media, in accordance with the submitted CAM Plan.

[45CSR§30-12.7. and 40 C.F.R. § 64.3(a)(1)]

- 6.2.4. The thermal oxidizer combustion chamber temperature shall be maintained above 1400°F, or such other minimum temperature demonstrated during the most recent performance test.

[45CSR§30-12.7. and 40 C.F.R. § 64.3(a)(2)]

- 6.2.5. The permittee shall conduct visual inspections of the closed vent system piping and any by-passes on a monthly basis.

[45CSR§30-12.7. and 40 C.F.R. § 64.3(a)(2)]

- 6.2.6. The permittee shall calibrate the temperature recorder used to measure the combustion chamber temperature in accordance with manufacturer's specifications.

[45CSR§30-12.7. and 40 C.F.R. § 64.3(b)(3)]

6.3. Testing Requirements

- 6.3.1. With regard to any testing required by the Director, the permittee shall submit to the Director of the Division of Air Quality a test protocol detailing the proposed test methods, the date, and the time the proposed testing is to take place, as well as identifying the sampling locations and other relevant information. The test protocol must be received by the Director no less than thirty (30) days prior to the date the testing is to take place. Test results shall be submitted to the Director no more than sixty (60) days after the date the testing takes place.

[45CSR13 - Permit R13-2565, Condition 4.3.1.]

- 6.3.2. To demonstrate compliance with Section 6.1.10. of this permit, the permittee shall conduct performance testing at least once every five years using EPA Test Methods or other methods approved by DEP. Test protocols and reports shall be maintained.

[45CSR§30-12.7. and 40 C.F.R. § 64.3(a)(1)]

6.4. Recordkeeping Requirements

- 6.4.1. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

[45CSR13 - Permit R13-2565, Condition 4.4.2.]

- 6.4.2. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.

- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR13 - Permit R13-2565, Condition 4.4.3.]

- 6.4.3. For the purpose of determining compliance with the processing limitation in Section 6.1.7. of this permit and the HAP emission limitations set forth in Section 6.1.13. of this permit, the permittee shall monitor and maintain a certified record of the wet gas throughput and hours of operation for Dehy #2 on a monthly basis. Compliance with the annual processing limit shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of the wet gas processed at any given time for the previous twelve (12) consecutive calendar months.

[45CSR§30-5.1.c.]

- 6.4.4. Compliance with the emission limits set forth in Section 6.1.8. of this permit for NO_x, CO, VOC, SO₂, and PM from the Dehy #2 Reboiler (2E) shall be determined based on compliance with the fuel consumption limitation of 0.75 MMBtu/hr, as indicated in Section 6.1.9. of this permit. The permittee shall maintain records of the hourly fuel usage and operating hours of the Dehy #2 reboiler on a monthly basis.

[45CSR§30-5.1.c.]

- 6.4.5. The permittee shall demonstrate compliance with the fuel consumption limitation of Section 6.1.12. of this permit by monitoring and keeping records of the gas consumption, in MMBtu, and hours of operation of the Dehy #2 thermal oxidizer on a monthly basis.

[45CSR§30-5.1.c.]

- 6.4.6. The permittee shall demonstrate compliance with the conditions of Section 6.2.3. of this permit by recording the thermal oxidizer combustion chamber operating temperature either manually on an hourly basis or by electronic media on a continuous basis. The temperature recording instrument shall be accurate to within 1.0% of the temperature being measured, or $\pm 1^{\circ}\text{C}$, whichever is greater.

[45CSR§30-12.7. and 40 C.F.R. § 64.3(b)(1)]

- 6.4.7. The permittee shall demonstrate compliance with the conditions of Section 6.2.5. of this permit by maintaining logs of the visual inspections of the closed vent system piping and any by-passes.

[45CSR§30-12.7. and 40 C.F.R. § 64.3(b)(1)]

- 6.4.8. An owner or operator that is exempt from control requirements under 40 CFR § 63.1274(d) shall maintain records of the actual average benzene emissions (in terms of benzene emissions per year), as determined in accordance with Section 6.2.2. of this permit, for each glycol dehydration unit.

[40 CFR § 63.1284(d) and 45CSR34]

6.5. Reporting Requirements

- 6.5.1. In the event the permittee shall deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

[45CSR13 - Permit R13-2565, Condition 2.14.]

6.6. Compliance Plan

- 6.6.1. None.